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May 29, 2025

**VIA ECF**

Honorable Jessica S. Allen  
United States Magistrate Judge  
United States District Court for the District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07102

Re: *In re Fragrance Direct Purchaser Antitrust Litig.*,  
Civil Action Nos. 23-02174, 23-03249, 23-16127

Dear Judge Allen:

Direct Purchaser, Indirect, and End-User Plaintiffs in the above-referenced matters (“Plaintiffs”) write jointly with Defendants pursuant to Your Honor’s March 26, 2025 Scheduling Order (ECF 193) to update the Court on the status of the parties’ meet and confer efforts to resolve jurisdictional discovery disputes and to seek the Court’s approval to continue these meet and confer efforts, which will enable the parties to resolve and/or narrow the remaining disputes for the Court.

Pursuant to L. Civ. R. 37.1(a)(1), collectively, the parties have met and conferred in good faith for over 12 hours and have scheduled meet and confers continuing through next week. In addition, Plaintiffs have communicated in writing with Defendants to clarify and narrow some of their requests in an effort to reach agreement on certain of Defendants’ objections.

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The parties continue to work in good faith to resolve and narrow any outstanding discovery issues and propose to provide a further written update to the Court on June 13, 2025, in advance of the June 17, 2025 Status Conference as to the progress of their continued meet and confer efforts, at which time, if necessary, the Court could set a briefing schedule to resolve any remaining disputes. If this meets with the Court's approval, the parties could also propose modifications to the deadlines in the Scheduling Order to accommodate time to produce, if needed, after the Court's rulings on the disputed discovery.

We thank Your Honor for your continued attention to these matters and we are available at the Court's convenience to answer any questions in advance of the June 17 conference.

Respectfully submitted,

CARELLA, BYRNE, CECCHI,  
OLSTEIN, BRODY & AGNELLO, P.C.

/s/ James E. Cecchi

JAMES E. CECCHI

cc: All counsel of record (ECF)

**SO ORDERED**

/s/ Jessica S. Allen

**Hon. Jessica S. Allen, U.S.M.J.**

**Date:** 5/30/25